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February 16, 2017

**VIA EMAIL ONLY**

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Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed, et al.*

Dear Counsel;

Enclosed please find Amended Notice to Take Deposition of Defendant, Mayfield City School District Board of Education, Pursuant to Rule 30(b)(6) FRCP with Duces Tecum Annexed. Your attention is directed to both the Amended Exhibit "A" concerning the "Matters on Which Examination is Requested" and the Amended Duces Tecum. I bold-faced the additional documents in the Duces Tecum not previously stated on the original Duces Tecum, and the additional "matters on which examination is requested" on Exhibit "A" similarly not stated on the original Exhibit "A".

I would also like to take the depositions of the following individuals, commencing at 1:00 p.m. on March 2, 2017, who were listed on my letter to counsel on December 28, 2016; to wit:

Nancy Barron – Phys Ed Teacher, Girls Track Coach  
Anthony Capora  
Frank Stubsky  
Michael Barnes  
Keith Leffler

Kindly advise your and their availability.

Very truly yours,

*/s/ Murray D. Bilfield*

Murray D. Bilfield  
BILFIELD & ASSOCIATES  
MDB/srs

Enclosure

